

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

NORTHLAND INSURANCE COMPANY	:	FILED ELECTRONICALLY
Plaintiff	:	
	:	
	:	
v.	:	No. 1:01-CV-763
	:	
LINCOLN GENERAL INSURANCE COMPANY,	:	
Defendant	:	(JUDGE KANE)

**DEFENDANT LINCOLN GENERAL INSURANCE COMPANY'S MOTION FOR
REINSTATEMENT OF THE AMENDED JUDGMENT ENTERED ON AUGUST 3, 2004
AND VACATION OF THE ORDER AND JUDGMENT ENTERED ON AUGUST 6, 2004**

AND NOW COMES, Defendant Lincoln General Insurance Company,
and moves the Court to reinstate the Amended Judgment of August
3, 2004, and vacate this Court's Order and Judgment of August 6,
2004. The basis for this motion is set forth in the accompanying
brief.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By /s/ Jonathan H. Rudd
Jonathan H. Rudd
PA. ID. No. 56880
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
(717) 237-5405

Attorneys for Lincoln General
Insurance Company

Dated: August 18, 2004

CERTIFICATE OF NON-CONCURRENCE

I, Jonathan H. Rudd, hereby certify that I have sought the concurrence of Ira Lipsius, counsel for Northland, in this motion, and Attorney Lipsius does not concur in this motion.

By /s/ Jonathan H. Rudd
Jonathan H. Rudd

CERTIFICATE OF SERVICE

I, Jonathan H. Rudd, Esquire, hereby certify that on this 18th day of August, 2004, a true and correct copy of the foregoing document was served via the Electronic Filing System upon the following:

**Ira S. Lipsius, Esquire
Schindel, Farman & Lipsius LLP
225 West 34th Street
New York, NY 10122**

/s/ Jonathan H. Rudd
Jonathan H. Rudd
PA. ID. No. 56880
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
(717) 237-5405